
From: DeOrchis, Vincent M. <VDeOrchis@mmwr.com>
Sent: Sunday, July 30, 2023 5:05 PM
To: KARPOUSIS, JOHN
Cc: Semenoro, Timothy; [REDACTED]; PALLAY, MATTHEW; HONEA, TANNER; Robert Suarez; Gino Zonghetti; claudio@castlerockrisk.com; peter.deegan@abl-group.com; James Kline; dtantrum@martinottaway.com; greg.rogers@burgoynes.com; Anil Nagalingam; MMWR_Grand_Costa_Davorio
Subject: Re: GRANDE COSTA D'AVORIO - evidence preservation

John,

I can't give you owners responses. I can only state at this time that I have heard "rumor" that the vessel had a market value of around 30 million" at the time of the incident, and I have "hear rumor" that the owner is trying to get estimates for repair "in the Mediterranean" and elsewhere . That is all I know: rumors.

Vincent M DeOrchis, Partner
Montgomery McCracken Walker & Rhoads, LLP
437 Madison Avenue
New York, NY 10022
917 566 9623
Sent From My iPhone



Vincent M DeOrchis | Partner
Montgomery McCracken Walker & Rhoads LLP
437 Madison Avenue | New York, NY 10022
Tel: 212-551-7730 | Fax: 212-599-5085 | vdeorchis@mmwr.com | [Attorney Profile](#)



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On Jul 30, 2023, at 4:28 PM, KARPOUSIS, JOHN <KARPOUSI@freehill.com> wrote:

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Vince-

I will take answers to my questions on a without prejudice basis—I just want a ballpark response form Owners in good faith....

Upon information and belief and without prejudice, the purchase, maintenance and repair records for the Jeep rests with Ports America, but I do not speak for them and defer to them.

The driver of the Jeep is still employed.

From: DeOrchis, Vincent M. <VDeOrchis@mmwr.com>

Sent: Sunday, July 30, 2023 4:22 PM

To: KARPOUSIS, JOHN <KARPOUSI@FREEHILL.COM>

Cc: Semenoro, Timothy <tsemenoro@mmwr.com>; [REDACTED]

[REDACTED]; PALLAY, MATTHEW <PALLAY@FREEHILL.COM>; HONEA, TANNER <HONEA@FREEHILL.COM>; Robert Suarez <robert.suarez@kdvlaw.com>; Gino Zonghetti <gzonghetti@kdvlaw.com>; claudio@castlerockrisk.com; peter.deegan@abl-group.com; James Kline <jkline@martinottaway.com>; dtantrum@martinottaway.com; greg.rogers@burgoyne.com; Anil Nagalingam <anil.nagalingam@burgoyne.com>; MMWR_Grand_Costa_Davorio <MMWR_Grand_Costa_Davorio@mmwr.com>

Subject: Re: GRANDE COSTA D'AVORIO - evidence preservation

Dear John,

All of those questions are being worked on with Coast Guard, Salvors, underwriters, and Class. When we can give definitive answers, we will let you know.

In the meantime, who has the purchase, maintenance and repair records for the Jeep? Is that AMS or Ports America?

Is the driver of the Jeep still employed?

Regards,

Vincent M DeOrchis, Partner
Montgomery McCracken Walker & Rhoads, LLP
437 Madison Avenue
New York, NY 10022
917 566 9623
Sent From My iPhone



Vincent M DeOrchis | Partner

Montgomery McCracken Walker & Rhoads LLP

437 Madison Avenue | New York, NY 10022

Tel: 212-551-7730 | Fax: 212-599-5085 | vdeorchis@mmwr.com | [Attorney Profile](#)



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On Jul 30, 2023, at 4:16 PM, KARPOUSIS, JOHN <KARPOUSI@freehill.com> wrote:

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noted.

can you provide answers to the following questions:

1. is there a timetable for the vessel's departure?
2. If so, where is it going, for what purpose, and when?
3. Also, have any valuation estimates been made with respect to the vessel both pre-casualty and post casualty?
4. If the answer to number 3 is yes, please provide those figures pre and post casualty?
5. In this vein, do we have figures for the value of the damaged cargo both pre and post casualty yet?

many thanks-
John K.

From: DeOrchis, Vincent M. <VDeOrchis@mmwr.com>

Sent: Sunday, July 30, 2023 4:13 PM

To: KARPOUSIS, JOHN <KARPOUSI@FREEHILL.COM>

Cc: Semenoro, Timothy <tsemenoro@mmwr.com>; [REDACTED]

[REDACTED] PALLAY, MATTHEW

<PALLAY@FREEHILL.COM>; HONEA, TANNER <HONEA@FREEHILL.COM>; Robert Suarez <robert.suarez@kdvlaw.com>; Gino Zonghetti <gzonghetti@kdvlaw.com>; claudio@castlerockrisk.com; peter.deegan@abl-group.com; James Kline <jkline@martinottaway.com>; dtantrum@martinottaway.com; greg.rogers@burgoynes.com; Anil Nagalingam <anil.nagalingam@burgoynes.com>; MMWR_Grand_Costa_Davorio <MMWR_Grand_Costa_Davorio@mmwr.com>

Subject: Re: GRANDE COSTA D'AVORIO - evidence preservation

John,

Appreciate the clarification. We have been trying to find out for three weeks who owned the Jeep. Would be helpful

If we could get the contract between AMS and Ports America.

But please do advise us on the backup of the phones as soon as convenient. That is critical.

Regards,

Vincent M DeOrchis, Partner
Montgomery McCracken Walker & Rhoads, LLP